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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

Denise L. Ybarra,

Plaintiff,

v.

Kilolo Kijakazi, Acting  
Commissioner of Social Security,

Defendant.

Case No. 1:21-cv-00324-SKO

STIPULATION AND ORDER FOR  
EXTENSION OF TIME

(Doc. 15)

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 45-day extension of time, from November 26, 2021 to January 10, 2022, for Plaintiff to serve on defendant with PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's first request for an extension of time. Plaintiff respectfully states that the requested extension is necessary due several merit briefs being due

1 on the same week. Counsel requires additional time to brief the issues thoroughly  
2 for the Court's consideration.

3 Additionally, Counsel has pre-planned vacation for the Thanksgiving and  
4 Christmas holidays.

5 Defendant does not oppose the requested extension. Counsel apologizes to  
6 the Defendant and Court for any inconvenience this may cause.

7  
8 Respectfully submitted,

9 Dated: October 19, 2021 PENA & BROMBERG, ATTORNEYS AT LAW  
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11 By: /s/ Jonathan Omar Pena  
12 JONATHAN OMAR PENA  
13 Attorneys for Plaintiff  
14

15 Dated: October 19, 2021 PHILLIP A. TALBERT  
16 Acting United States Attorney  
17 LISA A. THOMAS  
18 Regional Chief Counsel, Region VII  
19 Social Security Administration  
20

21 By: \*/s/ Jennifer E. Whelan  
22 Jennifer E. Whelan  
23 Special Assistant United States Attorney  
24 Attorneys for Defendant  
25 (\*As authorized by email on October 19, 2021)  
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**ORDER**

Pursuant to the parties' above stipulation (Doc. 15), and for good cause shown, IT IS HEREBY ORDERED that Plaintiff shall have an extension, up to and including January 10, 2022, to file her motion for summary judgment. All other dates in the Scheduling Order (Doc. 14) shall be extended accordingly.

IT IS SO ORDERED.

Dated: **October 20, 2021**

/s/ Sheila K. Oberto  
UNITED STATES MAGISTRATE JUDGE